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AZ CORP COMMISSION
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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

) Docket No. T-00000A-97-0238
)
) AT&T'S COMMENTS ON THE
) FUNCTIONALITY TEST RESULTS
) COMPARISON REPORT

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T"), hereby file their comments on the Functionality Test Results Report, Draft Version 2.0, dated March 1, 2002, (hereinafter, "Report"), of Cap Gemini Telecom Media & Networks U.S., Inc. ("CGE&Y").

I. Introduction

In several meetings held during January, 2002, AT&T urged the Arizona Corporation Commission Staff to require CGE&Y to conduct additional evaluations of the correctness of Qwest's calculation of performance results because of the myriad problems and failings to satisfy testing requirements for independent re-calculation of Pseudo-CLEC performance results. *See AT&T Comments on the Arizona § 271 Performance Indicator Definitions (PID) Data Element Summary Report, March 11, 2002.* The Report shows that AT&T's suggestions were well founded because CGE&Y has determined that its prior evaluations were insufficient to find the discrepancies and inconsistencies that are divulged for the first time in the Report. Granted,

the performance measurements process is a complex one; however, the Master Test Plan (“MTP”) and the Test Standards Document (“TSD”) reflect the need to probe deeply and thoroughly to find the sources of discrepancies.¹ CGE&Y needs to stay the course in pursuing explanations and corrections to Qwest data collection and calculations to resolve the issues in the Report that demonstrate the unreliability of Qwest’s reported results.

In the Background section of the Report, CGE&Y does not adequately reflect how the Performance Measures Audit (“PMA”) was conducted. CGE&Y fails to mention that the controlling documents (*i.e.*, MTP and TSD) specified that the audit was to be based on the three most current consecutive months of data.² Despite AT&T’s protestations to the contrary, some measures were not audited on this basis, using fewer months of data. Additionally, AT&T supplied its comments on the Interim PMA, noting significant areas of testing that were not conducted according to the controlling documents. CGE&Y’s claim that it “expanded the scope of the PMA to include the validation of Qwest’s input data” is not completely accurate³ The validation of the input data would have been accomplished, however, if CGE&Y’s had conducted the test according to TSD Section 7.3.4 and MTP Section 8.5.3 requirements.

CGE&Y notes that its data reconciliation process contained the steps such that “data elements captured by the Pseudo-CLEC through the gateway notifiers were compared to the corresponding Qwest adhoc data element.” *Report at 5.* The controlling documents make no mention of any distinction between data elements that are captured through gateway notifiers or obtained otherwise in establishing the Pseudo-CLEC data.

In its Process section, CGE&Y indicates its first Task is “Utilizing Appendix B of the PID Data Element Summary Report, prepare a definition for each PID measure listed in

¹ MTP, version 4.2, June 29, 2001, § 8; and TSD, version 2.10, September 6, 2001, § 7.

² TSD, § 7.1 (at 7-1); MTP, § 8.3.2 (at 8-3).

³ Report at 4.

Appendix C of the MTP, the FTMs, for which the Pseudo-CLEC independently gathered the necessary elements to perform the calculation.” AT&T recommends that the prepared definition be described as an *alternate* definition to avoid any confusion with the definition of each PID that has been agreed in the TAG.

II. PO-2 – Electronic Flow Through

CGE&Y reports that 1,287 LSRs received FOCs in the Functionality Test. This is inconsistent with the number of FOCs received according to the data contained in the Draft Final Report for PO-2A (*i.e.*, 1,582). There should not be fewer FOCs reported in the Report than were identified in the Functionality Test. Also, AT&T finds that the number of FOCs identified in the Daily Log files (1,446) also exceeds the number reported in the Results section.

III. PO-5 – Firm Order Confirmation Interval

In its Formula for this measurement, the following statement made by CGE&Y is ambiguous: “For Pseudo-CLEC captured data, the FOC interval is calculated by the difference between the LSR submission date and time and the FOC date and time.” The FOC data should be defined as the FOC *received* date and time.

IV. PO-6 – Work Completion Notification Timeliness

In its Formula for this measurement, CGE&Y needs to clear up the following statement: “For Qwest adhoc data, the completion notification interval is calculated by first determining the difference between the date and time the order is posted as complete (“POST_DT”) and the date and time the notification is sent to the Pseudo-CLEC (“SENT_DT”) for all records in the WNOT adhoc data.” The system that is to be used as the source of the posted orders is WFA.

The Results show remarkably few Work Completion Notifications received (*i.e.*, 199). The Functionality Test results in the Draft Final Report provide more than twice as many notifications received. The Daily Logs show six times as many SOC's were received by the Pseudo-CLEC.

The Findings and Conclusions also needs clarification. CGE&Y points out that "the POST_TM field in the adhoc WNOT data marks an event somewhat subsequent to the generation of the last status update sent to the Pseudo-CLEC indicating 'Order completed'." The Qwest documentation that is at issue should not be ambiguous. The specific event that establishes the content of the POST_TM field should be described. If CGE&Y asked Qwest for clarification on the "event" it should provide Qwest's clarification.

V. PO-7 – Billing Completion Notification Timeliness

CGE&Y reports that 94 EDI LSRs were completed and the Pseudo-CLEC received the related billing completion notifier. This contrasts with 488 EDI service order completion notices that are reflected in the Functionality Test data. The Draft Final Report shows that 191 EDI billing completion notices were received. CGE&Y should reconcile the differences.

VI. PO-9 – Timely Jeopardy Notices

CGE&Y introduces an undefined term in its Formula section, *i.e.*, "Pseudo-CLEC classified orders." CGE&Y should establish the meaning of this term.

In its Findings and Conclusions, CGE&Y identifies IWO 2130 as the means to obtain additional information from Qwest. AT&T submitted a request to CGE&Y on February 27, 2002, regarding this IWO. AT&T reserves the right to amend these Comments upon receipt of the additional information.

VII. OP-3 – Installation Commitments Met

CGE&Y's results show that it accounts for 980 service order completions in the Functionality Test. This volume contrasts with its report of 1,054 in the Draft Final Report, Section 2.5. CGE&Y reconcile the difference.

In its Findings and Conclusions, CGE&Y identifies IWO 2130 as the means to obtain additional information from Qwest. AT&T submitted a request to CGE&Y on February 27, 2002, regarding this IWO. AT&T reserves the right to amend these Comments upon receipt of the additional information.

VIII. OP-6 – Delayed Days

In its Findings and Conclusions, CGE&Y identifies IWO 2130 as the means to obtain additional information from Qwest. AT&T submitted a request to CGE&Y on February 27, 2002, regarding this IWO. AT&T reserves the right to amend these Comments upon receipt of the additional information.

IX. BI-1 – Time to Provide Recorded Usage Records

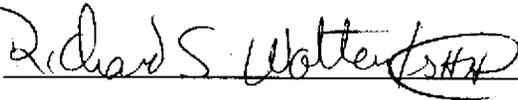
CGE&Y describes its Formula adequately but fails to provide a precise definition of the way Qwest calculates the DUF interval. "For Qwest adhoc data, the DUF interval is calculated by the multiplying the number of daily usage records transmitted ("MSGCTQTY") by the DUF interval ("ELAP_TM") for each DUF interval in the adhoc. The sum of these products gives the total DUF interval." CGE&Y should explain how Qwest calculates the ELPA_TM field for each DUF record.

X. Conclusion

AT&T must conclude that CGE&Y's Report is still a draft and that the evaluation is not complete. AT&T encourages CGE&Y to continue its evaluation of Qwest data and reconcile the discrepancies identified by AT&T.

Dated this 12th day of March, 2002

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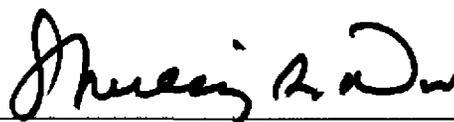
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